

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP., Plaintiff,	§
v.	§ Case No. 2:24-cv-00093-JRG (Lead Case)
HEWLETT PACKARD ENTERPRISE COMPANY, Defendants.	§ JURY TRIAL DEMANDED
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VIRTAMOVE, CORP., Plaintiff,	§
v.	§ Case No. 2:24-CV-00064-JRG (Member Case)
INTERNATIONAL BUSINESS MACHINES CORPORATION, Defendants.	§ JURY TRIAL DEMANDED
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**JOINT MOTION TO EXTEND DEADLINES TO SERVE INFRINGEMENT AND
INVALIDITY CONTENTIONS**

Plaintiff VirtaMove, Corp. (“Plaintiff”), Defendant Hewlett Packard Enterprise Co., and Defendant International Business Machines Corp. (“Defendant”) hereby jointly file this motion to extend the deadlines to serve infringement contentions and to serve invalidity and subject matter eligibility contentions in the above-captioned, consolidated cases. Currently, infringement contentions are due on May 15, 2024, and invalidity and subject matter eligibility contentions are due on July 10, 2024. *See* ECF 31 in Lead Case No. 2:23-CV-00093.

The Parties ask for a brief three-week extension of the deadline for compliance with Local Rule P.R. 3-1 and 3-2 from Wednesday, May 15th to Wednesday, June 5, and in addition to that extension, the Parties also request an extension of the deadline to comply with Local Rule P.R. 3-3 and 3-4 and the Standing Order Regarding Subject Matter Invalidity Contentions, from

Wednesday, July 10, 2024, to Wednesday, August 21, 2024.

These extensions are not sought for purposes of delay, and the Parties do not anticipate these extensions to affect any expected deadlines in this case.

A proposed order is attached herewith.

Dated: May 15, 2024

Respectfully submitted,

By: /s/ Reza Mirzaie

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Attorneys for Hewlett Packard Enterprise Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on this 15th day of May, 2024.

/s/ Peter Tong
Peter Tong

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that pursuant to Local Rule CV-7(h) counsel for Defendants IBM Corp. and Hewlett Packard Enterprise Co. have conferred with counsel for Plaintiff and the relief requested in this motion is joint.

/s/ Peter Tong
Peter Tong